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Attorney for Plaintiff

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF ALASKA

UNITED STATES OF AMERICA, )

Plaintiff, )

vs. )

No. 3:21-cr-00031-JMK-DMS

RENE ALEJANDRO POMPA-VILLA, )

CHRISTOPHER POMPA-VILLA, )

VICTOR AUGUSTIN POMPA-VILLA, )

CARLOS ARMANDO CAMACHO, )

HEYDIMAR CARRION MARRERO, )

KIMBERLY RENEE MACKEY, )

DUSTIN ROBERT NOONAN, )

TYLER JON LANDROCHE, )

KYLE JAY REDPATH, AND )

JESSICA TWIGG, )

Defendants. )

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**[PROPOSED] PROTECTIVE ORDER REGARDING DISCOVERY**

Upon consideration of the partially unopposed motion of the United States, the court finds good cause to regulate discovery in this matter pursuant to Fed. R. Crim. P. 16(d)(1). Accordingly, IT IS HEREBY ORDERED that:

1. All discovery produced by the United States in this case is for use by the defense team solely for investigating, preparing for trial, trial, and any appeals of this matter and for no other purpose. The defense team may not distribute, disseminate, disclose, or exhibit discovery materials to any person who is not a part of the defense team except as further set forth herein. The phrase “defense team,” as used in this order, includes the defendant, attorneys of record in the case, as well as attorneys, paralegals, investigators, experts, and secretaries employed by the attorneys of record and performing work on behalf of the defendant.

2. Counsel of record is ordered to ensure that every member of his/her defense team is advised of the Order and agrees in writing to be bound by its terms.

3. The defense team shall take all reasonable steps to: (a) maintain the confidentiality of the discovery, and (b) safeguard the discovery produced in this case from disclosure to or review by any third party.

4. The defense team may share discovery materials with any investigators, consultants or experts retained by the defense in connection with this case, provided that the defense team informs any such individual(s) of this Order and obtains his/her written agreement to be bound by its terms.

5. The defense team may show witnesses discovery materials as necessary for the preparation of the defense but may not provide copies of the materials to witnesses absent further order of the Court.

6. To the extent that the discovery materials contain any individual's personal information within the meaning of Rule 27 of the District of Alaska Electronic Filing Procedures Guide, the defense team shall redact any filings referencing or containing said materials in a manner consistent with the District of Alaska Electronic Filing Procedures Guide.

7. At the conclusion of all proceedings in this case, including any appeals or habeas petitions, the defense team shall destroy or return to the United States all copies of the discovery, or certify to the United States that counsel will store the case file, including all discovery, in a manner consistent with counsel's practice and will not produce the case file to anyone outside the Defense Team absent a court order.

8. If defense counsel withdraws or is disqualified from participation in this case, the defense team shall, upon request of the government, provide to new counsel or return to the United States all copies of the discovery within 10 days. The government shall send a formal request to the defense upon withdrawal or disqualification to initiate the transfer or return of discovery materials pursuant to this paragraph.

9. The government shall maintain discovery materials in its archives consistent with Department of Justice policy for document retention and destruction, and will

rediscover such materials to the defense as requested for any future litigation related to this matter, to the extent such a request is consistent with the law.

10. Nothing in this order precludes any party from using discovery materials in a filing that complies with Rule 27 of the District of Alaska Electronic Filing Procedures Guide or during a hearing or trial.

IT IS SO ORDERED.

DATED this \_\_\_\_\_ day of \_\_\_\_\_, 2021, at Anchorage, Alaska.

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DEBORAH M. SMITH  
CHIEF U.S. MAGISTRATE JUDGE